

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 19-mj-5193-JGD
)	
SHIVANI PATEL)	
)	
Defendant)	

GOVERNMENT’S MOTION TO UNSEAL COMPLAINT
AND FILE REDACTED AFFIDAVIT IN SUPPORT OF COMPLAINT

The United States of America, by Andrew E. Lelling, United States Attorney, and Justin D. O’Connell, Assistant United States Attorney for the District of Massachusetts, moves the Court to direct that the criminal complaint in the above-styled matter be unseal, with the exception of the supporting affidavit.

In support of this motion, the government states that the defendant was arrested on June 19, 2019, and, with the exception of the reasons stated below related to the supporting affidavit, there is no further reason to keep the criminal complaint and related materials sealed. The government also moves to keep the affidavit under seal in so far as it references an individual’s home address. *See* FED. R. CRIM. P. 49.1 (mandating redaction of home addresses). In accordance with FED. R. CRIM. P. 49.1, the government proposes to file Attachment A—a redacted form of the supporting affidavit—on the public docket with the Court’s approval.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Justin D. O’Connell
JUSTIN D. O’CONNELL
Assistant U.S. Attorney

Date: June 19, 2019